

EXHIBIT A

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*Attorneys for Defendants Thomson SA and
Thomson Consumer Electronics, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-5944-SC

MDL No. 1917

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
et al.*, No. 13-cv-1173;

*Electrograph Systems, Inc., et al. v. Technicolor
SA, et al.*, No. 13-cv-05724;

Siegel v. Technicolor SA, et al., No. 13-cv-
05261;

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al.*, No. 13-cv-05264;

**THOMSON SA'S RESPONSES TO
DIRECT ACTION PLAINTIFFS' FIRST
SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS**

1 *Target Corp. v. Technicolor SA, et al.*, No. 13-
cv-05686;

2 *Interbond Corporation of America v.*
3 *Technicolor SA, et al.*, No. 13-cv-05727;

4 *Office Depot, Inc. v. Technicolor SA, et al.*, No.
13-cv-05726;

5 *Costco Wholesale Corporation v. Technicolor*
6 *SA, et al.*, No. 13-cv-05723;

7 *P.C. Richard & Son Long Island Corporation,*
8 *et al. v. Technicolor SA, et al.*, No. 13-cv-
05725;

9 *Schultze Agency Services, LLC v. Technicolor*
10 *SA, et al.*, No. 13-cv-05668;

11 *Sears, Roebuck and Co. and Kmart Corp. v.*
12 *Technicolor SA, et al.*, No. 13-cv-05262;

13 *Tech Data Corp., et al. v. Hitachi Ltd., et al.*,
No. 13-cv-00157.

14 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Thomson SA
15 hereby responds to the First Set of Requests for Production of Documents propounded by the
16 Plaintiffs in the above-captioned cases ("Plaintiffs") as follows:

17 **GENERAL OBJECTIONS**

18 1. Thomson SA and its counsel are continuing their investigation of this matter.

19 2. Thomson SA's present responses are based on information known as of this time.
20 Thomson SA makes these responses without prejudice to its right to supplement them, as
21 necessary, based on subsequently acquired information or knowledge, whether gained through
22 Thomson SA's continued investigation or the investigation of others.

23 3. Thomson SA objects to each and every request to the extent it seeks documents
24 regarding Thomson SA's former CRT and/or CRT Finished Product business as overbroad and
25 unduly burdensome because Thomson SA exited the CRT and CRT Finished Product industry in
26 2005, when its CRT related assets and personnel were transferred to Videocon. As such, much
27 of the evidence and many of the witnesses who may have possessed information regarding these
28 businesses is difficult, if not impossible, for Thomson SA to locate, access, and obtain. And,

1 even if Thomson SA is able to obtain documents regarding these businesses, most of the former
2 Thomson SA personnel needed to explain and interpret them have long since left the company,
3 making it all the more difficult for Thomson SA to determine if such documents are responsive
4 to Plaintiffs' requests. Moreover, by waiting to file their instant claims until 2013, over six year
5 after the first claims were filed in this case, the Plaintiffs have exacerbated these difficulties.

6 4. Thomson SA objects to Plaintiffs' requests, definitions, and instructions to the
7 extent they seek the discovery of documents or information regarding the sale of CRTs or
8 finished products containing CRTs outside of the United States and unrelated to United States
9 commerce on the grounds that they are overbroad, unduly burdensome, irrelevant, and not
10 reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the
11 scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United
12 States, and beyond the jurisdiction or reach of the laws of any State.

13 5. Thomson SA objects to each request, definition, or instruction to the extent it
14 seeks documents or information regarding conduct outside the applicable statute(s) of limitations
15 on the grounds that such documents and information are neither relevant to any claims or
16 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
17 evidence.

18 6. In making these responses, Thomson SA does not concede the relevancy or
19 materiality of any of Plaintiffs' requests for production nor does Thomson SA concede the
20 relevancy or materiality of any of the subjects to which those requests relate or refer.

21 7. To the extent any request, definition, or instruction may be construed as calling
22 for the disclosure of privileged or immune information, including, without limitation,
23 information subject to the attorney-client privilege, common-interest privilege, work-product
24 doctrine, joint defense privilege, and/or any other privilege or immunity from discovery,
25 Thomson SA hereby claims such privileges and protections and objects to the disclosure of any
26 documents or information subject thereto. Thomson SA will not produce such privileged or
27 protected documents, materials, or information and states that to the extent any such documents,
28

1 materials, or information are produced, the production is inadvertent and not intended to waive
2 those privileges or protections.

3 8. To the extent any request, definition, or instruction may be construed as seeking
4 the disclosure of confidential trade secrets, financial, commercial, strategic, or otherwise
5 proprietary or confidential information, Thomson SA objects to the disclosure of any such
6 documents or information. To the extent any such material is produced in this action, Thomson
7 SA reserves the right to appropriately designate it pursuant to the protective order in place in this
8 action, and to seek such additional terms and protections as may be appropriate. Thomson SA
9 further objects to providing documents or information subject to a confidentiality agreement or
10 other restrictions or to a protective order entered in another action or proceeding, except in
11 accordance with such confidentiality agreements, restrictions, or protective orders.

12 9. Thomson SA objects to any request, definition, or instruction that calls for the
13 disclosure of documents or information that would violate the legitimate privacy rights and
14 expectations of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both
15 current and former, or other individuals, to the extent that such privacy rights or expectations are
16 protected by law, contract, or public policy.

17 10. To the extent any request, definition, or instruction may be construed as requiring
18 Thomson SA to characterize documents or their contents or to speculate as to what documents
19 may or may not show, Thomson SA objects to such request, definition, or instruction as vague,
20 ambiguous, and calling for legal conclusions and speculation.

21 11. A response by Thomson SA that it will produce non-privileged documents that it
22 believes to be responsive to a particular request, if any, is not a representation that documents in
23 that category exist nor is such a response (or the production of any documents in a particular
24 category) a representation that Thomson SA adopts, accepts, affirms, or admits the assertions,
25 contentions, or definitions used or made in connection with the request.

26 12. Thomson SA objects to each and every request, definition, and instruction to the
27 extent that it purports to impose burdens upon Thomson SA that are not permitted by law, or
28 seeks to impose greater obligations than those imposed under the Federal Rules of Civil

1 Procedure, the Local Rules of the District Court of the Northern District of California, or any
2 order of the Court.

3 13. Thomson SA objects to each and every request, definition, and instruction to the
4 extent that it seeks documents or information the disclosure of which is prohibited by law,
5 regulation, court order, or other authority of the foreign jurisdiction in which the documents or
6 information are located, including, without limitation, Loi 80-538 du 16 juillet 1980 relative à la
7 communication de documents et renseignements d'ordre économique, commercial ou technique
8 à des personnes physiques ou morales étrangères [Law 80-538 of July 16, 1980 relating to the
9 disclosure of documents and information of an economic, commercial, or technical nature to
10 foreign natural and legal persons], JOURNAL OFFICIEL DE LA REPUBLIQUE FRANÇAISE [J.O.]
11 [OFFICIAL GAZETTE OF FRANCE], July 17, 1980, p. 1799; *Cour de cassation*, Criminal Chamber,
12 Dec. 12, 2007, no. 07-83228, *Christopher X*; Loi Informatique et Libertés Act N°78-17 of
13 January 6, 1978 [Law No. 78-17 of 6 January 1978 on data processing, data files, and individual
14 liberties]. Thomson SA further objects to the extent such request, definition, or instruction seeks
15 discovery in contravention of the principles of public policy or international comity.

16 14. Thomson SA objects to each and every request to the extent it seeks testimony or
17 information that is unduly burdensome to obtain. Thomson SA objects to each and every request
18 as unduly burdensome to the extent: (i) it seeks information not within the possession, custody,
19 control, or knowledge of Thomson SA or its current officers, directors, or employees; (ii) it
20 would require an unreasonable investigation on the part of Thomson SA; (iii) the discovery
21 sought is unreasonably cumulative or duplicative; or (iv) the information sought is obtainable
22 from some other source that is more convenient, less burdensome, or less expensive. Thomson
23 SA construes each request as requiring only a reasonable search of its files likely to contain
24 relevant or responsive information and a reasonable inquiry of Thomson SA employees likely to
25 have information relevant to the subject matter of this litigation.

26 15. Thomson SA objects to each and every request, definition, and instruction to the
27 extent it calls for the creation of documents or data compilations that do not exist or that are not
28 ordinarily kept in the normal course of business.

16. Thomson SA objects to each and every request, definition, and instruction to the extent it assumes disputed facts or legal conclusions. Thomson SA hereby denies any disputed facts or legal conclusions assumed by each request, definition, and instruction. Any response or objection herein is without prejudice to this objection and Thomson SA's right to dispute facts and legal conclusions assumed by the requests, definitions, and instructions.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request No. 1.

Documents sufficient to show Your corporate structure or organization throughout the Relevant Period, including, but not limited to, departments, divisions, parents, subsidiaries, joint ventures, Affiliated Entities, or other sub-units that were engaged during any part of the Relevant Period in the manufacture, marketing, sale or distribution of CRT in the United States, including, where applicable, the percentage of any stock or other interests owned by each entity in the chain.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or protected documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or protection. Thomson SA also objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, information as to Thomson SA's non-CRT operations. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to

1 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
 2 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
 3 products containing CRTs outside of the United States and unrelated to United States commerce
 4 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
 5 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
 6 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
 7 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
 8 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
 9 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
 10 located, including, without limitation, the laws of France set forth in General Objection No. 13.
 11 Finally, Thomson SA objects to this request to the extent it is duplicative of or unreasonably
 12 cumulative to other discovery produced in this action.

13 Subject to and without limiting each of these objections, Thomson SA will produce non-
 14 privileged, responsive documents located in the course of a reasonable search to the extent such
 15 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 16 documents are located, including, without limitation, the laws of France set forth in General
 17 Objection No. 13.

18 **Request No. 2.**

19 As to each of Your divisions, subdivisions, departments, units, subsidiaries, parents,
 20 Affiliated Entities and joint ventures, Documents sufficient to identify each executive or
 21 Employee with managerial authority who had responsibilities or duties with respect to each of
 22 the following:

- 23 (a) the manufacturing or production of CRTs;
- 24 (b) the marketing of CRTs;
- 25 (c) the pricing of CRTs;
- 26 (d) the sale or distribution of CRTs;
- 27 (e) maintaining any electronic database(s), including archives, of e-mail or other
 28 electronic Documents relating to CRTs.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects that the phrases “responsibilities or duties” and “managerial authority” are vague and
7 ambiguous in the context of this request and its subparts. Thomson SA also objects to this
8 request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks
9 documents and information that are neither relevant to any claims or defenses in this litigation
10 nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA objects
11 to this request because Plaintiffs’ use of the phrase “Affiliated Entities” attempts to impose an
12 obligation on Thomson SA to produce documents that are not in its possession, custody, or
13 control. Thomson SA further objects to this request to the extent it calls for the creation of
14 documents or data compilations that do not exist or are not ordinarily kept in the normal course
15 of business. Thomson SA also objects to this request to the extent it seeks information or
16 documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily
17 available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further
18 objects to this request to the extent it seeks the discovery of information regarding the sale of
19 CRTs or finished products containing CRTs outside of the United States and unrelated to United
20 States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not
21 reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the
22 scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United
23 States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this
24 request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it
25 would violate the laws of the foreign jurisdiction(s) in which the information and/or documents
26 are located, including, without limitation, the laws of France set forth in General Objection No.
27 13. Finally, Thomson SA objects to this request to the extent it is duplicative of or unreasonably
28 cumulative to other discovery produced in this action.

1 Subject to and without limiting each of these objections, Thomson SA will produce non-
 2 privileged, responsive documents located in the course of a reasonable search to the extent such
 3 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 4 documents are located, including, without limitation, the laws of France set forth in General
 5 Objection No. 13.

6 **Request No. 3.**

7 All Documents relating to Communications regarding CRTs between or among
 8 manufacturers of CRTs, including Defendants.

9 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 10 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 11 privileged or immune documents or information, including, without limitation, documents or
 12 information subject to the attorney-client privilege, common-interest privilege, work-product
 13 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 14 objects that this request is vague and ambiguous, including, without limitation, as to the phrases
 15 “relating to any Communication” and “You and any other manufacturer of CRTs” as used in this
 16 request. Thomson SA also objects to this request to the extent it seeks documents or information
 17 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
 18 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
 19 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
 20 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
 21 calls for the creation of documents or data compilations that do not exist or are not ordinarily
 22 kept in the normal course of business. Thomson SA also objects to this request to the extent it
 23 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
 24 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
 25 Thomson SA further objects to this request to the extent it seeks the discovery of information
 26 regarding the sale of CRTs or finished products containing CRTs outside of the United States
 27 and unrelated to United States commerce on the grounds that it is overbroad, unduly
 28 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible

1 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
2 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
3 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
4 of information and/or documents responsive to it would violate the laws of the foreign
5 jurisdiction(s) in which the information and/or documents are located, including, without
6 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
7 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
8 and seeks documents and information that are neither relevant to any claims or defenses in this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without limiting each of these objections, Thomson SA will produce non-
11 privileged, responsive documents located in the course of a reasonable search to the extent such
12 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
13 documents are located, including, without limitation, the laws of France set forth in General
14 Objection No. 13.

15 **Request No. 4.**

16 All Documents relating to any Communication between You (or any other Defendant or
17 Co-conspirator) and any other manufacturer of CRTs concerning, relating to, and/or mentioning
18 the production, marketing, pricing, distribution, inventory levels or sale of CRTs.

19 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
20 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
21 privileged or immune documents or information, including, without limitation, documents or
22 information subject to the attorney-client privilege, common-interest privilege, work-product
23 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
24 objects that this request is vague and ambiguous, including, without limitation, as to the phrases
25 “relating to any Communication” and “You and any other manufacturer of CRTs” as used in this
26 request. Thomson SA also objects to this request to the extent it seeks documents or information
27 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
28 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is

1 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
2 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
3 calls for the creation of documents or data compilations that do not exist or are not ordinarily
4 kept in the normal course of business. Thomson SA also objects to this request to the extent it
5 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
6 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
7 Thomson SA further objects to this request to the extent it seeks the discovery of information
8 regarding the sale of CRTs or finished products containing CRTs outside of the United States
9 and unrelated to United States commerce on the grounds that it is overbroad, unduly
10 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
11 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
12 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
13 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
14 of information and/or documents responsive to it would violate the laws of the foreign
15 jurisdiction(s) in which the information and/or documents are located, including, without
16 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
17 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
18 and seeks documents and information that are neither relevant to any claims or defenses in this
19 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without limiting each of these objections, Thomson SA will produce non-
21 privileged, responsive documents located in the course of a reasonable search to the extent such
22 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
23 documents are located, including, without limitation, the laws of France set forth in General
24 Objection No. 13.

25 **Request No. 5.**

26 All Documents relating to any Meeting attended by You or any other Defendant or any
27 manufacturer of CRTs during which there was any Communication concerning the production,
28

1 marketing, pricing, distribution, inventory levels or sale of CRTs, including, but not limited to,
2 the notes of any such Meetings.

3 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
4 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
5 privileged or immune documents or information, including, without limitation, documents or
6 information subject to the attorney-client privilege, common-interest privilege, work-product
7 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
8 objects that this request is vague and ambiguous, including, without limitation, as to the phrase
9 “relating to any meeting” as used in this request. Thomson SA also objects to this request to the
10 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
11 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
12 oppressive, and seeks information that is neither relevant to any claims or defenses in this
13 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson
14 SA further objects to this request to the extent it calls for the creation of documents or data
15 compilations that do not exist or are not ordinarily kept in the normal course of business.
16 Thomson SA also objects to this request to the extent it seeks information or documents in the
17 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
18 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
19 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
20 products containing CRTs outside of the United States and unrelated to United States commerce
21 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
22 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
23 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
24 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
25 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
26 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
27 located, including, without limitation, the laws of France set forth in General Objection No. 13.
28 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly

1 burdensome, and oppressive, and seeks documents and information that are neither relevant to
 2 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
 3 admissible evidence.

4 Subject to and without limiting each of these objections, Thomson SA will produce non-
 5 privileged, responsive documents located in the course of a reasonable search to the extent such
 6 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 7 documents are located, including, without limitation, the laws of France set forth in General
 8 Objection No. 13.

9 **Request No. 6.**

10 For each of Your Employees who has or had any non-clerical responsibility for
 11 recommending, reviewing, setting or approving prices, price increase announcements, bids or
 12 quotes for the sale of CRTs, or any other involvement in the marketing or sale of CRTs:

- 13 (a) all copies of electronic and manual diaries, calendars, appointment books, "to do"
 14 lists, day timers or appointment notes;
- 15 (b) all copies of trip and travel logs, records or other supporting Documents;
- 16 (c) all copies of expense reports or other supporting Documents;
- 17 (d) all copies of telephone number logs, directories, notebooks, Rolodex cards or related
 18 memoranda;
- 19 (e) all bills, statements, records and supporting Documents concerning long distance or
 20 cellular telephone calls;
- 21 (f) all Documents relating to membership in any trade association or industry group; and
- 22 (g) the complete personnel file for that Employee.

23 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 24 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 25 privileged or immune documents or information, including, without limitation, documents or
 26 information subject to the attorney-client privilege, common-interest privilege, work-product
 27 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
 28 objects to this request to the extent it would violate the legitimate privacy rights and expectations

1 of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both current and
2 former, or other individuals. Thomson SA further objects that this request is vague and
3 ambiguous, including, without limitation, as to the phrase “non-clerical responsibility” as used in
4 this request. Thomson SA also objects to this request to the extent it seeks documents or
5 information regarding conduct outside the applicable statute(s) of limitations and/or continuing
6 to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks
7 information that is neither relevant to any claims or defenses in this litigation nor reasonably
8 calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this
9 request to the extent it calls for the creation of documents or data compilations that do not exist
10 or are not ordinarily kept in the normal course of business. Thomson SA also objects to this
11 request to the extent it seeks information or documents in the possession, custody, or control of
12 Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third
13 parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the
14 discovery of information regarding the sale of CRTs or finished products containing CRTs
15 outside of the United States and unrelated to United States commerce on the grounds that it is
16 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
17 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
18 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
19 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
20 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
21 jurisdiction(s) in which the information and/or documents are located, including, without
22 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
23 objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and
24 oppressive, and seeks documents and information that are neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

27 Subject to and without limiting each of these objections, Thomson SA will produce non-
28 privileged, responsive documents located in the course of a reasonable search to the extent such

1 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
2 documents are located, including, without limitation, the laws of France set forth in General
3 Objection No. 13.

4 **Request No. 7.**

5 Documents sufficient to show the name and address of each trade association (including
6 committees and subcommittees) relating to CRTs of which You or any of Your Employees are or
7 have been a member, as well as Documents sufficient to show dates of membership and dates of
8 participation in committees or subcommittees.

9 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
10 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
11 privileged or immune documents or information, including, without limitation, documents or
12 information subject to the attorney-client privilege, common-interest privilege, work-product
13 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
14 objects to this request to the extent it seeks documents or information regarding conduct outside
15 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
16 overbroad as to time, unduly burdensome, oppressive, and seeks information that is neither
17 relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the
18 discovery of admissible evidence. Thomson SA further objects to this request to the extent it
19 calls for the creation of documents or data compilations that do not exist or are not ordinarily
20 kept in the normal course of business. Thomson SA also objects to this request to the extent it
21 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
22 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
23 Thomson SA further objects to this request to the extent it seeks the discovery of information
24 regarding the sale of CRTs or finished products containing CRTs outside of the United States
25 and unrelated to United States commerce on the grounds that it is overbroad, unduly
26 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
27 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
28 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the

1 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
2 of information and/or documents responsive to it would violate the laws of the foreign
3 jurisdiction(s) in which the information and/or documents are located, including, without
4 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
5 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
6 and seeks documents and information that are neither relevant to any claims or defenses in this
7 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

8 Subject to and without limiting each of these objections, Thomson SA will produce non-
9 privileged, responsive documents located in the course of a reasonable search to the extent such
10 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
11 documents are located, including, without limitation, the laws of France set forth in General
12 Objection No. 13.

13 **Request No. 8.**

14 All Documents relating to Meetings of each trade association and each of its committees
15 or subcommittees relating to CRTs, including all Documents relating to any such Meeting
16 attended by You and any other CRTs manufacturer and Documents sufficient to identify
17 individuals from Your company who attended, the dates of attendance, and the subject matters
18 discussed.

19 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
20 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
21 privileged or immune documents or information, including, without limitation, documents or
22 information subject to the attorney-client privilege, common-interest privilege, work-product
23 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
24 objects to this request to the extent it seeks documents or information regarding conduct outside
25 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
26 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
27 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
28 admissible evidence. Thomson SA further objects to this request to the extent it calls for the

creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 9.

All studies, analyses, Communications, presentations or other Documents that You have submitted to or received from any trade association regarding CRTs.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or

1 continuing to the present on the grounds that it is overbroad, unduly burdensome, oppressive,
2 and seeks information that is neither relevant to any claims or defenses in this litigation nor
3 reasonably calculated to lead to the discovery of admissible evidence. Thomson SA also objects
4 to this request to the extent it seeks information or documents in the possession, custody, or
5 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
6 Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent
7 it seeks the discovery of information regarding the sale of CRTs or finished products containing
8 CRTs outside of the United States and unrelated to United States commerce on the grounds that
9 it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the
10 discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the
11 subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction
12 or reach of the laws of any State. Thomson SA objects to this request to the extent that
13 disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws
14 of the foreign jurisdiction(s) in which the information and/or documents are located, including,
15 without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson
16 SA objects to this request on the grounds that it is overbroad, unduly burdensome, and
17 oppressive, and seeks documents and information that are neither relevant to any claims or
18 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Subject to and without limiting each of these objections, Thomson SA will produce non-
21 privileged, responsive documents located in the course of a reasonable search to the extent such
22 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
23 documents are located, including, without limitation, the laws of France set forth in General
24 Objection No. 13.

25 **Request No. 10.**

26 All statements, announcements, disclosures or press releases issued by You or any of
27 Your competitors relating to CRTs.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 documents or information regarding conduct outside the applicable statute(s) of limitations and/or
4 continuing to the present on the grounds that it is overbroad, unduly burdensome, oppressive,
5 and seeks information that is neither relevant to any claims or defenses in this litigation nor
6 reasonably calculated to lead to the discovery of admissible evidence. Thomson SA also objects
7 to this request to the extent it seeks information or documents in the possession, custody, or
8 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
9 Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent
10 it seeks the discovery of information regarding the sale of CRTs or finished products containing
11 CRTs outside of the United States and unrelated to United States commerce on the grounds that
12 it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the
13 discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the
14 subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction
15 or reach of the laws of any State. Thomson SA objects to this request to the extent that
16 disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws
17 of the foreign jurisdiction(s) in which the information and/or documents are located, including,
18 without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson
19 SA objects to this request on the grounds that it is overbroad, unduly burdensome, and
20 oppressive, and seeks documents and information that are neither relevant to any claims or
21 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Subject to and without limiting each of these objections, Thomson SA will produce non-
24 privileged, responsive documents located in the course of a reasonable search to the extent such
25 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
26 documents are located, including, without limitation, the laws of France set forth in General
27 Objection No. 13.

Request No. 11.

All Documents and electronic data relating to Your sales of CRTs during the Relevant Period, including, but not limited to:

- (a) customer names, customer billing addresses, and customer ship-to addresses;
- (b) sales terms;
- (c) sales dates and shipment dates;
- (d) product type, class, category, description, and respective use;
- (e) sales volumes;
- (f) unit price information, gross price, and actual net prices;
- (g) discounts, credits, and rebates;
- (h) shipping charges and terms;
- (i) any other related charges; and
- (j) amounts paid, dates paid, invoice numbers, and purchase order numbers.

If such data are not kept, or have not been kept, in electronic form in the ordinary course of Your business or are otherwise not available in electronic form, please produce such data in hard copy.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks

1 information or documents in the possession, custody, or control of Plaintiffs, or that are equally
2 or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
3 Thomson SA further objects to this request to the extent it seeks the discovery of information
4 regarding the sale of CRTs or finished products containing CRTs outside of the United States
5 and unrelated to United States commerce on the grounds that it is overbroad, unduly
6 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
7 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
8 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
9 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
10 of information and/or documents responsive to it would violate the laws of the foreign
11 jurisdiction(s) in which the information and/or documents are located, including, without
12 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
13 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
14 and seeks documents and information that are neither relevant to any claims or defenses in this
15 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 Subject to and without limiting each of these objections, Thomson SA will produce non-
17 privileged, responsive documents located in the course of a reasonable search to the extent such
18 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
19 documents are located, including, without limitation, the laws of France set forth in General
20 Objection No. 13.

21 **Request No. 12.**

22 All software instructions, programs, manuals, or other Documents necessary to operate,
23 run or understand any of the programs maintained on the computer-related equipment or system
24 utilized by You to maintain, gain access to or read data produced in response to Request No. 11,
25 including all record layouts, field codes, or other descriptions.

26 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
27 though fully set forth herein, Thomson SA objects that this request is vague and ambiguous.
28 Thomson SA further objects to this request to the extent it seeks documents or information

1 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
2 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
3 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
4 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
5 calls for the creation of documents or data compilations that do not exist or are not ordinarily
6 kept in the normal course of business. Thomson SA also objects to this request to the extent it
7 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
8 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
9 Thomson SA further objects to this request to the extent it seeks the discovery of information
10 regarding the sale of CRTs or finished products containing CRTs outside of the United States
11 and unrelated to United States commerce on the grounds that it is overbroad, unduly
12 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
13 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
14 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
15 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
16 of information and/or documents responsive to it would violate the laws of the foreign
17 jurisdiction(s) in which the information and/or documents are located, including, without
18 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
19 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
20 and seeks documents and information that are neither relevant to any claims or defenses in this
21 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without limiting each of these objections, Thomson SA will meet and
23 confer with Plaintiffs to discuss whether any additional materials may be reasonably required in
24 connection with non-privileged, responsive documents produced pursuant to Request No. 11.

25 **Request No. 13.**

26 All Documents relating to policies, methods, formulas or factors to be used in
27 determining, computing or quoting prices, including any rebates or discounts, in connection with
28 the sale of CRTs.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects to this request on the grounds that it is vague and ambiguous, including, without
7 limitation, as to the terms “policies,” “methods,” “formulas,” and “factors” as used in this
8 request. Thomson SA also objects to this request to the extent it seeks documents or information
9 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
10 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
11 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
12 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
13 calls for the creation of documents or data compilations that do not exist or are not ordinarily
14 kept in the normal course of business. Thomson SA also objects to this request to the extent it
15 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
16 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
17 Thomson SA further objects to this request to the extent it seeks the discovery of information
18 regarding the sale of CRTs or finished products containing CRTs outside of the United States
19 and unrelated to United States commerce on the grounds that it is overbroad, unduly
20 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
21 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
22 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
23 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
24 of information and/or documents responsive to it would violate the laws of the foreign
25 jurisdiction(s) in which the information and/or documents are located, including, without
26 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
27 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
28

1 and seeks documents and information that are neither relevant to any claims or defenses in this
2 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without limiting each of these objections, Thomson SA will produce non-
4 privileged, responsive documents located in the course of a reasonable search to the extent such
5 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
6 documents are located, including, without limitation, the laws of France set forth in General
7 Objection No. 13.

8 **Request No. 14.**

9 All Documents relating to any published prices for CRTs during the Relevant Period,
10 including price announcements, price lists, price schedules, or price changes communicated to
11 customers in the United States, Mexico, and Canada.

12 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
13 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
14 privileged or immune documents or information, including, without limitation, documents or
15 information subject to the attorney-client privilege, common-interest privilege, work-product
16 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
17 objects to this request on the grounds that it is vague and ambiguous, including, without
18 limitation, as to the phrase “relating to any published prices” as used in this request. Thomson
19 SA also objects to this request to the extent it seeks documents or information regarding conduct
20 outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it
21 is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to
22 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
23 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
24 creation of documents or data compilations that do not exist or are not ordinarily kept in the
25 normal course of business. Thomson SA also objects to this request to the extent it seeks
26 information or documents in the possession, custody, or control of Plaintiffs, or that are equally
27 or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
28 Thomson SA further objects to this request to the extent it seeks the discovery of information

1 regarding the sale of CRTs or finished products containing CRTs outside of the United States
2 and unrelated to United States commerce on the grounds that it is overbroad, unduly
3 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
4 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
5 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
6 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
7 of information and/or documents responsive to it would violate the laws of the foreign
8 jurisdiction(s) in which the information and/or documents are located, including, without
9 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
10 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
11 and seeks documents and information that are neither relevant to any claims or defenses in this
12 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

13 Subject to and without limiting each of these objections, Thomson SA will produce non-
14 privileged, responsive documents located in the course of a reasonable search to the extent such
15 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
16 documents are located, including, without limitation, the laws of France set forth in General
17 Objection No. 13.

18 **Request No. 15.**

19 All Documents relating to contracts, offers or proposals for CRT sales during the
20 Relevant Period.

21 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
22 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
23 privileged or immune documents or information, including, without limitation, documents or
24 information subject to the attorney-client privilege, common-interest privilege, work-product
25 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
26 objects to this request on the grounds that it is vague and ambiguous, including, without
27 limitation, as to the terms “contracts,” “offers,” and “proposals” as used in this request.
28 Thomson SA also objects to this request to the extent it seeks documents or information

1 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
2 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
3 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
4 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
5 calls for the creation of documents or data compilations that do not exist or are not ordinarily
6 kept in the normal course of business. Thomson SA also objects to this request to the extent it
7 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
8 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
9 Thomson SA further objects to this request to the extent it seeks the discovery of information
10 regarding the sale of CRTs or finished products containing CRTs outside of the United States
11 and unrelated to United States commerce on the grounds that it is overbroad, unduly
12 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
13 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
14 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
15 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
16 of information and/or documents responsive to it would violate the laws of the foreign
17 jurisdiction(s) in which the information and/or documents are located, including, without
18 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
19 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
20 and seeks documents and information that are neither relevant to any claims or defenses in this
21 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without limiting each of these objections, Thomson SA will produce non-
23 privileged, responsive documents located in the course of a reasonable search to the extent such
24 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
25 documents are located, including, without limitation, the laws of France set forth in General
26 Objection No. 13.

Request No. 16.

Documents sufficient to identify each of Your facilities that produced CRTs during the Relevant Period, and for each such facility, all Documents relating to:

- (a) capacity, rated capacity, production and capacity utilization during each year of the Relevant Period;
- (b) any proposed or actual change in the capacity to produce CRTs;
- (c) any reason for changes in each facility's actual production of CRTs;
- (d) the identity of all persons who had decision-making or supervisory responsibility regarding CRTs production;
- (e) each type, class, category and respective use of CRTs produced and the amounts of each produced during each month of the Relevant Period;
- (f) any production shutdowns or slowdowns of CRTs production and reasons for such shutdowns or slowdowns;
- (g) any projected production forecasts; and
- (h) any future plans to construct, joint venture or purchase fabrication plants used to manufacture or produce CRTs.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrases “any proposed . . . change in . . . capacity,” “any reason for changes,” and “any future plans” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson

SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 17.

All Documents relating to the cost of manufacturing, marketing, selling, and distributing CRTs during the Relevant Period.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks

1 privileged or immune documents or information, including, without limitation, documents or
2 information subject to the attorney-client privilege, common-interest privilege, work-product
3 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
4 objects to this request on the grounds that it is vague and ambiguous, including, without
5 limitation, as to the term “cost.” Thomson SA also objects to this request to the extent it seeks
6 documents or information that are properly the subject of expert discovery, and is therefore
7 premature, and/or to the extent that this request calls for the disclosure of documents or
8 information constituting or containing non-testifying expert opinions protected from discovery
9 pursuant to, *inter alia*, Fed. R. Civ. Proc. 26(b)(4)(B). Thomson SA also objects to this request
10 to the extent it seeks documents or information regarding conduct outside the applicable
11 statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly
12 burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses
13 in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.
14 Thomson SA further objects to this request to the extent it calls for the creation of documents or
15 data compilations that do not exist or are not ordinarily kept in the normal course of business.
16 Thomson SA also objects to this request to the extent it seeks information or documents in the
17 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
18 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
19 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
20 products containing CRTs outside of the United States and unrelated to United States commerce
21 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
22 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
23 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
24 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
25 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
26 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
27 located, including, without limitation, the laws of France set forth in General Objection No. 13.
28 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly

1 burdensome, and oppressive, and seeks documents and information that are neither relevant to
2 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
3 admissible evidence.

4 Subject to and without limiting each of these objections, Thomson SA will produce non-
5 privileged, responsive documents located in the course of a reasonable search to the extent such
6 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
7 documents are located, including, without limitation, the laws of France set forth in General
8 Objection No. 13.

9 **Request No. 18.**

10 Documents sufficient to show Your inventory levels of CRTs for each month, quarter,
11 calendar year or fiscal year during the Relevant Period.

12 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
13 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
14 privileged or immune documents or information, including, without limitation, documents or
15 information subject to the attorney-client privilege, common-interest privilege, work-product
16 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
17 objects to this request on the grounds that it is vague and ambiguous, including, without
18 limitation, as to the phrase “inventory levels” as used in this request. Thomson SA also objects
19 to this request to the extent it seeks documents or information regarding conduct outside the
20 applicable statute(s) of limitations and/or continuing to present on the grounds that it is
21 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
22 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
23 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
24 creation of documents or data compilations that do not exist or are not ordinarily kept in the
25 normal course of business. Thomson SA also objects to this request to the extent it seeks
26 information or documents in the possession, custody, or control of Plaintiffs, or that are equally
27 or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
28 Thomson SA further objects to this request to the extent it seeks the discovery of information

1 regarding the sale of CRTs or finished products containing CRTs outside of the United States
 2 and unrelated to United States commerce on the grounds that it is overbroad, unduly
 3 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
 4 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
 5 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
 6 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
 7 of information and/or documents responsive to it would violate the laws of the foreign
 8 jurisdiction(s) in which the information and/or documents are located, including, without
 9 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
 10 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
 11 and seeks documents and information that are neither relevant to any claims or defenses in this
 12 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

13 Subject to and without limiting each of these objections, Thomson SA will produce non-
 14 privileged, responsive documents located in the course of a reasonable search to the extent such
 15 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 16 documents are located, including, without limitation, the laws of France set forth in General
 17 Objection No. 13.

18 **Request No. 19.**

19 Documents sufficient to identify and quantify all swaps, trades, sales, purchases or
 20 transfers of CRTs between You and any of Your Affiliated Entities, or between You and any
 21 other producer of CRTs, and the price or any other consideration involved in every such sale,
 22 swap, trade, purchase or transfer.

23 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 24 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 25 privileged or immune documents or information, including, without limitation, documents or
 26 information subject to the attorney-client privilege, common-interest privilege, work-product
 27 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 28 objects to this request on the grounds that it is vague and ambiguous, including, without

1 limitation, as to the phrases “You and any of Your Affiliated Entities” and “any other
2 consideration involved” as used in this request. Thomson SA also objects to this request to the
3 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
4 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
5 oppressive, and seeks information that is neither relevant to any claims or defenses in this
6 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson
7 SA further objects to this request to the extent it calls for the creation of documents or data
8 compilations that do not exist or are not ordinarily kept in the normal course of business.
9 Thomson SA also objects to this request to the extent it seeks information or documents in the
10 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
11 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
12 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
13 products containing CRTs outside of the United States and unrelated to United States commerce
14 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
15 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
16 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
17 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
18 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
19 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
20 located, including, without limitation, the laws of France set forth in General Objection No. 13.
21 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
22 burdensome, and oppressive, and seeks documents and information that are neither relevant to
23 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
24 admissible evidence.

25 Subject to and without limiting each of these objections, Thomson SA will produce non-
26 privileged, responsive documents located in the course of a reasonable search to the extent such
27 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
28

documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 20.

All Documents relating to any relationship between prices for CRTs and any costs of producing, marketing, selling, or distributing CRTs during the Relevant Period.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the term “costs.” Thomson SA also objects to this request to the extent it seeks documents or information that are properly the subject of expert discovery, and is therefore premature, and/or to the extent that this request calls for the disclosure of documents or information constituting or containing non-testifying expert opinions protected from discovery pursuant to, *inter alia*, Fed. R. Civ. Proc. 26(b)(4)(B). Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated

1 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
 2 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
 3 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
 4 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
 5 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
 6 located, including, without limitation, the laws of France set forth in General Objection No. 13.
 7 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
 8 burdensome, and oppressive, and seeks documents and information that are neither relevant to
 9 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
 10 admissible evidence.

11 Subject to and without limiting each of these objections, Thomson SA will produce non-
 12 privileged, responsive documents located in the course of a reasonable search to the extent such
 13 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 14 documents are located, including, without limitation, the laws of France set forth in General
 15 Objection No. 13.

16 **Request No. 21.**

17 All of Your internal and public annual, quarterly and monthly financial statements,
 18 summaries or analyses, including profit-and-loss statements and comparisons to budget that
 19 relate to CRTs.

20 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 21 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 22 privileged or immune documents or information, including, without limitation, documents or
 23 information subject to the attorney-client privilege, common-interest privilege, work-product
 24 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 25 objects to this request on the grounds that it is vague and ambiguous, including, without
 26 limitation, as to the phrase “summaries or analyses” as used in this request. Thomson SA also
 27 objects to this request to the extent it seeks documents or information regarding conduct outside
 28 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is

1 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
2 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
3 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
4 creation of documents or data compilations that do not exist or are not ordinarily kept in the
5 normal course of business. Thomson SA also objects to this request to the extent it seeks
6 information or documents in the possession, custody, or control of Plaintiffs, or that are equally
7 or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
8 Thomson SA further objects to this request to the extent it seeks the discovery of information
9 regarding the sale of CRTs or finished products containing CRTs outside of the United States
10 and unrelated to United States commerce on the grounds that it is overbroad, unduly
11 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
12 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
13 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
14 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
15 of information and/or documents responsive to it would violate the laws of the foreign
16 jurisdiction(s) in which the information and/or documents are located, including, without
17 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
18 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
19 and seeks documents and information that are neither relevant to any claims or defenses in this
20 litigation nor reasonably calculated to lead to the discovery of admissible evidence, including,
21 without limitation, information as to Thomson SA's non-CRT operations.

22 Subject to and without limiting each of these objections, Thomson SA will produce non-
23 privileged, responsive documents located in the course of a reasonable search to the extent such
24 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
25 documents are located, including, without limitation, the laws of France set forth in General
26 Objection No. 13.

Request No. 22.

All business plans, planning analyses, budgets, forecasts, or sales or profit projections relating to CRTs.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the terms “business plans,” “planning analyses,” “budgets,” “forecasts,” and “sales or profit projections” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are

1 located, including, without limitation, the laws of France set forth in General Objection No. 13.
2 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
3 burdensome, and oppressive, and seeks documents and information that are neither relevant to
4 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without limiting each of these objections, Thomson SA will produce non-
7 privileged, responsive documents located in the course of a reasonable search to the extent such
8 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
9 documents are located, including, without limitation, the laws of France set forth in General
10 Objection No. 13.

11 **Request No. 23.**

12 Documents sufficient to identify the CRTs (by manufacturer, type, size, resolution,
13 brightness, contrast ratio, and viewing angle) that each of the following entities installed in each
14 of its CRT Products (by model number and timeframe (e.g., year, quarter, week, or month))
15 during the Relevant Period:

- 16 (a) You;
17 (b) Thomson Consumer;
18 (c) Technologies Displays;
19 (d) Videocon Industries, Ltd.;
20 (e) Any other Affiliated Entity of You or (b)-(d) above.

21 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
22 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
23 privileged or immune documents or information, including, without limitation, documents or
24 information subject to the attorney-client privilege, common-interest privilege, work-product
25 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
26 objects to this request to the extent it seeks documents or information regarding conduct outside
27 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
28 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any

1 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
2 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
3 creation of documents or data compilations that do not exist or are not ordinarily kept in the
4 normal course of business. Thomson SA objects to this request because Plaintiffs' use of the
5 phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce
6 documents that are not in its possession, custody, or control. Thomson SA also objects to this
7 request to the extent it seeks information or documents in the possession, custody, or control of
8 Plaintiffs, other Defendants, or third-parties, or that are equally or more readily available to
9 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
10 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
11 products containing CRTs outside of the United States and unrelated to United States commerce
12 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
13 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
14 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
15 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
16 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
17 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
18 located, including, without limitation, the laws of France set forth in General Objection No. 13.
19 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
20 burdensome, and oppressive, and seeks documents and information that are neither relevant to
21 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without limiting each of these objections, Thomson SA will produce non-
24 privileged, responsive documents located in the course of a reasonable search to the extent such
25 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
26 documents are located, including, without limitation, the laws of France set forth in General
27 Objection No. 13.

Request No. 24.

Documents sufficient to show any and all manufacturers and sizes of CRTs that each of the following entities approved or preapproved for purchase and use in CRT Products at any given time during the Relevant Period, including, but not limited to, any “approved CRT” lists or similar documents identifying the part number, product number, manufacturer, type, size, resolution, brightness, contrast ratio, and/or viewing angle of each CRT approved for purchase and use:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

If any of the listed entities had different lists of approved CRT Manufacturers for a given CRT size, end product type, model, or brand, identify the approved CRT Manufacturer(s) at the finest product granularity at which such approvals were established.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrases “approved or preapproved for purchase” and “any ‘approved CRT’ lists” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to

1 this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an
2 obligation on Thomson SA to produce documents that are not in its possession, custody, or
3 control. Thomson SA further objects to this request to the extent it seeks information or
4 documents that are in the possession, custody, or control of Plaintiffs, or that are equally or more
5 readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA
6 objects to this request to the extent it seeks the discovery of information regarding the sale of
7 CRTs or finished products containing CRTs outside of the United States and unrelated to United
8 States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not
9 reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the
10 scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United
11 States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this
12 request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it
13 would violate the laws of the foreign jurisdiction(s) in which the information and/or documents
14 are located, including, without limitation, the laws of France set forth in General Objection No.
15 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
16 burdensome, and oppressive, and seeks documents and information that are neither relevant to
17 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without limiting each of these objections, Thomson SA will produce non-
20 privileged, responsive documents located in the course of a reasonable search to the extent such
21 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
22 documents are located, including, without limitation, the laws of France set forth in General
23 Objection No. 13.

24 **Request No. 25.**

25 Documents sufficient to identify all of the CRT Products by model number and year (or
26 month or other time period if not consistent for the year) in which each of the following entities
27 exclusively used and installed CRTs manufactured by a Defendant or Co-conspirator in this
28 litigation during the Relevant Period:

- 1 (a) Thomson Consumer;
- 2 (b) Technologies Displays;
- 3 (c) Videocon Industries, Ltd.;
- 4 (d) Any other Affiliated Entity of You or (a)-(c) above.

5 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
6 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
7 privileged or immune documents or information, including, without limitation, documents or
8 information subject to the attorney-client privilege, common-interest privilege, work-product
9 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
10 objects to this request on the grounds that it is vague and ambiguous, including, without
11 limitation, as to the phrase “exclusively used and installed” as used in this request. Thomson
12 SA also objects to this request to the extent it seeks documents or information regarding conduct
13 outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it
14 is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to
15 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
16 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
17 creation of documents or data compilations that do not exist or are not ordinarily kept in the
18 normal course of business. Thomson SA objects to this request because Plaintiffs’ use of the
19 phrase “Affiliated Entities” attempts to impose an obligation on Thomson SA to produce
20 documents that are not in its possession, custody, or control. Thomson SA objects to this request
21 to the extent it seeks information or documents in the possession, custody, or control of
22 Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third
23 parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the
24 discovery of information regarding the sale of CRTs or finished products containing CRTs
25 outside of the United States and unrelated to United States commerce on the grounds that it is
26 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
27 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
28 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach

1 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
 2 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
 3 jurisdiction(s) in which the information and/or documents are located, including, without
 4 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
 5 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
 6 and seeks documents and information that are neither relevant to any claims or defenses in this
 7 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

8 Subject to and without limiting each of these objections, Thomson SA will produce non-
 9 privileged, responsive documents located in the course of a reasonable search to the extent such
 10 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 11 documents are located, including, without limitation, the laws of France set forth in General
 12 Objection No. 13.

13 **Request No. 26.**

14 All Documents relating to Your policies or practices directed toward compliance with the
 15 United States antitrust laws, including any statements signed by Your Employees with pricing,
 16 sales or marketing responsibility for CRTs, acknowledging their receipt of and compliance with
 17 any antitrust compliance policy.

18 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 19 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 20 privileged or immune documents or information, including, without limitation, documents or
 21 information subject to the attorney-client privilege, common-interest privilege, work-product
 22 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 23 objects to this request on the grounds that it is vague and ambiguous, including, without
 24 limitation, as to the phrase “policies or practices directed toward compliance with the United
 25 States antitrust laws” as used in this request. Thomson SA also objects to this request to the
 26 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
 27 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
 28 oppressive, and seeks information that is neither relevant to any claims or defenses in this

1 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson
2 SA further objects to this request to the extent it calls for the creation of documents or data
3 compilations that do not exist or are not ordinarily kept in the normal course of business.
4 Thomson SA also objects to this request to the extent it seeks information or documents in the
5 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
6 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
7 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
8 products containing CRTs outside of the United States and unrelated to United States commerce
9 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
10 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
11 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
12 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
13 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
14 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
15 located, including, without limitation, the laws of France set forth in General Objection No. 13.
16 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
17 burdensome, and oppressive, and seeks documents and information that are neither relevant to
18 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
19 admissible evidence.

20 Subject to and without limiting each of these objections, Thomson SA will produce non-
21 privileged, responsive documents located in the course of a reasonable search to the extent such
22 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
23 documents are located, including, without limitation, the laws of France set forth in General
24 Objection No. 13.

25 **Request No. 27.**

26 All Documents relating to the termination, retirement, discipline, discharge or suspension
27 of any director, officer, or Employee who had any responsibility relating to the production,
28 manufacture, distribution, marketing, pricing or sale of CRTs.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects to this request to the extent it would violate the legitimate privacy rights and expectations
7 of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both current and
8 former, or other individuals. Thomson SA objects to this request to the extent that disclosure to
9 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
10 jurisdiction(s) in which the information and/or documents are located, including, without
11 limitation, the laws of France set forth in General Objection No. 13. Thomson SA further
12 objects that this request is vague and ambiguous, including, without limitation, as to the phrase
13 “any responsibility” as used in this request. Thomson SA also objects to this request to the
14 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
15 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
16 oppressive, and seeks information that is neither relevant to any claims or defenses in this
17 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson
18 SA further objects to this request to the extent it calls for the creation of documents or data
19 compilations that do not exist or are not ordinarily kept in the normal course of business.
20 Thomson SA also objects to this request to the extent it seeks information or documents in the
21 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
22 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
23 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
24 products containing CRTs outside of the United States and unrelated to United States commerce
25 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
26 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
27 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
28 beyond the jurisdiction or reach of the laws of any State. Finally, Thomson SA objects to this

1 request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks
2 documents and information that are neither relevant to any claims or defenses in this litigation
3 nor reasonably calculated to lead to the discovery of admissible evidence, including, without
4 limitation, information as to Thomson SA's non-CRT operations.

5 **Request No. 28.**

6 All Documents relating to Your percentage or share of industry production, capacity,
7 sales or shipments of CRTs, or the percentage or share of industry production, capacity, sales or
8 shipments of any other producer or seller of CRTs at any time during the Relevant Period.

9 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
10 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
11 privileged or immune documents or information, including, without limitation, documents or
12 information subject to the attorney-client privilege, common-interest privilege, work-product
13 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
14 objects to this request on the grounds that it is vague and ambiguous, including, without
15 limitation, as to the phrase "percentage or share of industry production, capacity, sales or
16 shipments" as used in this request. Thomson SA also objects to this request to the extent it seeks
17 documents or information regarding conduct outside the applicable statute(s) of limitations
18 and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive,
19 and seeks information that is neither relevant to any claims or defenses in this litigation nor
20 reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further
21 objects to this request to the extent it calls for the creation of documents or data compilations that
22 do not exist or are not ordinarily kept in the normal course of business. Thomson SA also
23 objects to this request to the extent it seeks information or documents in the possession, custody,
24 or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
25 Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent
26 it seeks the discovery of information regarding the sale of CRTs or finished products containing
27 CRTs outside of the United States and unrelated to United States commerce on the grounds that
28 it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the

1 discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the
2 subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction
3 or reach of the laws of any State. Thomson SA objects to this request to the extent that
4 disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws
5 of the foreign jurisdiction(s) in which the information and/or documents are located, including,
6 without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson
7 SA objects to this request on the grounds that it is overbroad, unduly burdensome, and
8 oppressive, and seeks documents and information that are neither relevant to any claims or
9 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence.

11 Subject to and without limiting each of these objections, Thomson SA will produce non-
12 privileged, responsive documents located in the course of a reasonable search to the extent such
13 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
14 documents are located, including, without limitation, the laws of France set forth in General
15 Objection No. 13.

16 **Request No. 29.**

17 All Documents showing the dollar volume or quantity of sales or shipments of CRTs (by
18 type or category, if available) by You or by other producers or sellers of CRTs by month,
19 quarter, calendar year or fiscal year during the Relevant Period.

20 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
21 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
22 privileged or immune documents or information, including, without limitation, documents or
23 information subject to the attorney-client privilege, common-interest privilege, work-product
24 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
25 objects to this request to the extent it seeks documents or information regarding conduct outside
26 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
27 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
28 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of

1 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
2 creation of documents or data compilations that do not exist or are not ordinarily kept in the
3 normal course of business. Thomson SA also objects to this request to the extent it seeks
4 information or documents that are not in its possession, custody, or control, that are in the
5 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
6 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
7 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
8 products containing CRTs outside of the United States and unrelated to United States commerce
9 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
10 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
11 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
12 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
13 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
14 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
15 located, including, without limitation, the laws of France set forth in General Objection No. 13.
16 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
17 burdensome, and oppressive, and seeks documents and information that are neither relevant to
18 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
19 admissible evidence.

20 Subject to and without limiting each of these objections, Thomson SA will produce non-
21 privileged, responsive documents located in the course of a reasonable search to the extent such
22 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
23 documents are located, including, without limitation, the laws of France set forth in General
24 Objection No. 13.

25 **Request No. 30.**

26 All Documents that compare or contrast each type, class, or category of CRTs produced
27 or sold by You with that of any other producer or seller of CRTs and all Documents that relate to
28 any industry standards regarding types, classes, or categories of CRTs.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects to this request on the grounds that it is vague and ambiguous, including, without
7 limitation, as to the phrase “industry standards” as used in this request. Thomson SA also
8 objects to this request to the extent it seeks documents or information regarding conduct outside
9 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
10 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
11 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
12 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
13 creation of documents or data compilations that do not exist or are not ordinarily kept in the
14 normal course of business. Thomson SA also objects to this request to the extent it seeks
15 information or documents in the possession, custody, or control of Plaintiffs, or that are equally
16 or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
17 Thomson SA further objects to this request to the extent it seeks the discovery of information
18 regarding the sale of CRTs or finished products containing CRTs outside of the United States
19 and unrelated to United States commerce on the grounds that it is overbroad, unduly
20 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
21 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
22 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
23 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
24 of information and/or documents responsive to it would violate the laws of the foreign
25 jurisdiction(s) in which the information and/or documents are located, including, without
26 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
27 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
28

1 and seeks documents and information that are neither relevant to any claims or defenses in this
2 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without limiting each of these objections, Thomson SA will produce non-
4 privileged, responsive documents located in the course of a reasonable search to the extent such
5 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
6 documents are located, including, without limitation, the laws of France set forth in General
7 Objection No. 13.

8 **Request No. 31.**

9 Documents sufficient to show the regions or territories in which each type, class, or
10 category of CRTs were sold in the United States during the Relevant Period.

11 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
12 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
13 privileged or immune documents or information, including, without limitation, documents or
14 information subject to the attorney-client privilege, common-interest privilege, work-product
15 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
16 objects to this request on the grounds that it is vague and ambiguous, including, without
17 limitation, as to the terms “regions” and “territories” as used in this request. Thomson SA
18 further objects to this request to the extent it calls for the creation of documents or data
19 compilations that do not exist or are not ordinarily kept in the normal course of business.
20 Thomson SA also objects to this request to the extent it seeks information or documents that are
21 not in its possession, custody, or control, that are in the possession, custody, or control of
22 Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third
23 parties, or otherwise. Thomson SA objects to this request to the extent that disclosure to
24 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
25 jurisdiction(s) in which the information and/or documents are located, including, without
26 limitation, the laws of France set forth in General Objection No. 13.

27 Subject to and without limiting each of these objections, Thomson SA will produce non-
28 privileged, responsive documents located in the course of a reasonable search to the extent such

1 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
2 documents are located, including, without limitation, the laws of France set forth in General
3 Objection No. 13.

4 **Request No. 32.**

5 All Documents relating to conditions of supply or demand for CRTs, including, but not
6 limited to, any market studies or industry reports during the Relevant Period.

7 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
8 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
9 privileged or immune documents or information, including, without limitation, documents or
10 information subject to the attorney-client privilege, common-interest privilege, work-product
11 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
12 objects to this request on the grounds that it is vague and ambiguous, including, without
13 limitation, as to the phrase “conditions of supply or demand” as used in this request. Thomson
14 SA also objects to this request to the extent it seeks documents or information that are properly
15 the subject of expert discovery, and is therefore premature, and/or to the extent that this request
16 calls for the disclosure of documents or information constituting or containing non-testifying
17 expert opinions protected from discovery pursuant to, *inter alia*, Fed. R. Civ. Proc. 26(b)(4)(B).
18 Thomson SA also objects to this request to the extent it seeks documents or information
19 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
20 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
21 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
22 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
23 calls for the creation of documents or data compilations that do not exist or are not ordinarily
24 kept in the normal course of business. Thomson SA also objects to this request to the extent it
25 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
26 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
27 Thomson SA further objects to this request to the extent it seeks the discovery of information
28 regarding the sale of CRTs or finished products containing CRTs outside of the United States

1 and unrelated to United States commerce on the grounds that it is overbroad, unduly
2 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
3 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
4 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
5 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
6 of information and/or documents responsive to it would violate the laws of the foreign
7 jurisdiction(s) in which the information and/or documents are located, including, without
8 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
9 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
10 and seeks documents and information that are neither relevant to any claims or defenses in this
11 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

12 Subject to and without limiting each of these objections, Thomson SA will produce non-
13 privileged, responsive documents located in the course of a reasonable search to the extent such
14 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
15 documents are located, including, without limitation, the laws of France set forth in General
16 Objection No. 13.

17 **Request No. 33.**

18 All Documents relating to any contemplated, proposed, planned, pending or executed
19 purchases, sales, acquisitions, mergers, joint ventures, divestitures, transfers, spin-offs or any
20 other change in ownership of any assets, liabilities, subsidiaries, departments, units or other
21 subdivisions of Your or another company relating to production, distribution, marketing, pricing,
22 sale or resale of CRTs during the Relevant Period.

23 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
24 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
25 privileged or immune documents or information, including, without limitation, documents or
26 information subject to the attorney-client privilege, common-interest privilege, work-product
27 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
28 objects to this request on the grounds that it is vague and ambiguous. Thomson SA also objects

1 to this request to the extent it seeks documents or information regarding conduct outside the
2 applicable statute(s) of limitations and/or continuing to present on the grounds that it is
3 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
4 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
5 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
6 creation of documents or data compilations that do not exist or are not ordinarily kept in the
7 normal course of business. Thomson SA objects to this request because Plaintiffs' use of the
8 phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce
9 documents that are not in its possession, custody, or control. Thomson SA also objects to this
10 request to the extent it seeks information or documents that are not in its possession, custody, or
11 control, that are in the possession, custody, or control of Plaintiffs, or that are equally or more
12 readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA
13 further objects to this request to the extent it seeks the discovery of information regarding the
14 sale of CRTs or finished products containing CRTs outside of the United States and unrelated to
15 United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and
16 not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond
17 the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the
18 United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA
19 objects to this request to the extent that disclosure to Plaintiffs of information and/or documents
20 responsive to it would violate the laws of the foreign jurisdiction(s) in which the information
21 and/or documents are located, including, without limitation, the laws of France set forth in
22 General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is
23 overbroad, unduly burdensome, and oppressive, and seeks documents and information that are
24 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
25 the discovery of admissible evidence.

Request No. 34.

Documents sufficient to show which Employees or members of Your Board of Directors served as a director and/or officer of Videocon Industries, Ltd. or any of its subsidiaries during the Relevant Period.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks information or documents that are not in its possession, custody, or control, that are in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are

1 located, including, without limitation, the laws of France set forth in General Objection No. 13.
2 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
3 burdensome, and oppressive, and seeks documents and information that are neither relevant to
4 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without limiting each of these objections, Thomson SA will produce non-
7 privileged, responsive documents located in the course of a reasonable search to the extent such
8 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
9 documents are located, including, without limitation, the laws of France set forth in General
10 Objection No. 13.

11 **Request No. 35.**

12 Documents relating to Your investment in Videocon Industries, Ltd. during the Relevant
13 Period, including Communications with Videocon Industries, Ltd., financial statements, financial
14 forecasts, and business plans.

15 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
16 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
17 privileged or immune documents or information, including, without limitation, documents or
18 information subject to the attorney-client privilege, common-interest privilege, work-product
19 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
20 objects to this request on the grounds that it is vague and ambiguous. Thomson SA also objects
21 to this request to the extent it seeks documents or information regarding conduct outside the
22 applicable statute(s) of limitations and/or continuing to present on the grounds that it is
23 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
24 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
25 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
26 creation of documents or data compilations that do not exist or are not ordinarily kept in the
27 normal course of business. Thomson SA also objects to this request to the extent it seeks
28 information or documents that are not in its possession, custody, or control, that are in the

possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will meet and confer with Plaintiffs to discuss whether this request may be narrowed so that the undue burden that would be imposed on Thomson SA by attempting to respond to this request as written, does not outweigh the probative value of the documents sought.

Request No. 36.

All Documents reflecting Communications between You and any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above;

relating to or reflecting the price or negotiation of prices for any such sale, purchase, or transfer of any CRTs.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrase “reflecting communications” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to this request because Plaintiffs’ use of the phrase “Affiliated Entities” attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA

objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 37.

All documents from the Relevant Period relating to or reflecting pricing guidelines for CRTs given to or provided by You by or to any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrase “relating to or reflecting pricing guidelines” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily

1 kept in the normal course of business. Thomson SA objects to this request because Plaintiffs'
 2 use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to
 3 produce documents that are not in its possession, custody, or control. Thomson SA also objects
 4 to this request to the extent it seeks information or documents in the possession, custody, or
 5 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
 6 Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent
 7 it seeks the discovery of information regarding the sale of CRTs or finished products containing
 8 CRTs outside of the United States and unrelated to United States commerce on the grounds that
 9 it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the
 10 discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the
 11 subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction
 12 or reach of the laws of any State. Thomson SA objects to this request to the extent that
 13 disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws
 14 of the foreign jurisdiction(s) in which the information and/or documents are located, including,
 15 without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson
 16 SA objects to this request on the grounds that it is overbroad, unduly burdensome, and
 17 oppressive, and seeks documents and information that are neither relevant to any claims or
 18 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
 19 evidence.

20 Subject to and without limiting each of these objections, Thomson SA will produce non-
 21 privileged, responsive documents located in the course of a reasonable search to the extent such
 22 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 23 documents are located, including, without limitation, the laws of France set forth in General
 24 Objection No. 13.

25 **Request No. 38.**

26 All Documents referring to or relating to Direct Action Plaintiffs in this litigation.

27 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 28 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks

1 privileged or immune documents or information, including, without limitation, documents or
2 information subject to the attorney-client privilege, common-interest privilege, work-product
3 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
4 objects to this request to the extent it seeks documents or information regarding conduct outside
5 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
6 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
7 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
8 admissible evidence. Thomson SA also objects to this request to the extent it seeks information
9 or documents in the possession, custody, or control of Plaintiffs, or that are equally or more
10 readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA
11 objects to this request to the extent that disclosure to Plaintiffs of information and/or documents
12 responsive to it would violate the laws of the foreign jurisdiction(s) in which the information
13 and/or documents are located, including, without limitation, the laws of France set forth in
14 General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is
15 overbroad, unduly burdensome, and oppressive, and seeks documents and information that are
16 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
17 the discovery of admissible evidence, including, without limitation, information as to Thomson
18 SA's non-CRT operations.

19 Subject to and without limiting each of these objections, Thomson SA will produce non-
20 privileged, responsive documents regarding Thomson SA's former CRT business located in the
21 course of a reasonable search to the extent such production will not violate the laws of the
22 foreign jurisdiction(s) in which the information and/or documents are located, including, without
23 limitation, the laws of France set forth in General Objection No. 13.

24 **Request No. 39.**

25 Documents sufficient to show when You became aware of any investigations into
26 anticompetitive conduct relating to CRTs, including, but not limited to, price fixing or
27 information exchanges.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects to this request on the grounds that it is vague and ambiguous, including, without
7 limitation, as to the phrase “became aware of any investigations” as used in this request.
8 Thomson SA also objects to this request to the extent it seeks documents or information
9 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
10 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
11 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
12 the discovery of admissible evidence. Thomson SA also objects to this request to the extent it
13 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
14 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
15 Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information
16 and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which
17 the information and/or documents are located, including, without limitation, the laws of France
18 set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the
19 grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and
20 information that are neither relevant to any claims or defenses in this litigation nor reasonably
21 calculated to lead to the discovery of admissible evidence.

22 Subject to and without limiting each of these objections, Thomson SA will produce non-
23 privileged, responsive documents located in the course of a reasonable search to the extent such
24 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
25 documents are located, including, without limitation, the laws of France set forth in General
26 Objection No. 13.

Request No. 40.

Documents sufficient to show when You became aware of any federal or state lawsuits regarding anticompetitive conduct relating to CRTs (including, but not limited to, price fixing or information exchanges).

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrase “became aware of any federal or state lawsuits” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or

documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 41.

All Documents that You claim would have been available to the Direct Action Plaintiffs or any purchaser of CRTs prior to November 2007, which should have caused them to investigate whether there was a conspiracy to fix, raise, maintain or stabilize the prices or to control or restrict sales of CRTs in the United States.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it purports to require Thomson SA to characterize documents or their contents or to speculate as to what documents may or may not show, as vague, ambiguous and calling for legal conclusions and speculation. Thomson SA further objects to this request to the extent it seeks documents that are publicly available, equally or more readily available to Plaintiffs from some other source, or not in Thomson SA's possession, custody, or control. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Thomson SA also objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 42.

All Documents relating to, prepared for, submitted to, or received from any foreign governmental or legislative investigative body, including the Canadian Competition Bureau, the European Commission, any agency or representative body of any foreign country, state or other

1 political subdivision, or any law enforcement agency, authority or commission in any foreign
2 country, relating to the production, sale, marketing, pricing or distribution of CRTs. This request
3 includes all Documents relating to proffers, transcripts, notes, summaries, testimony, witness
4 statements, or responses to requests for information that You produced to any foreign
5 governmental agency or foreign grand jury, including any Documents produced as part of any
6 plea bargain negotiations or in connection with any application for or grant of amnesty.

7 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
8 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
9 privileged or immune documents or information, including, without limitation, documents or
10 information subject to the attorney-client privilege, common-interest privilege, work-product
11 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
12 objects to this request to the extent it seeks documents or information the disclosure of which is
13 prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which
14 the documents or information are located, including, without limitation, the laws of France set
15 forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the
16 request contravenes applicable principles of public policy and international comity. Thomson
17 SA further objects to this request to the extent it seeks documents and information outside the
18 scope of discovery authorized by this Court's Orders. Thomson SA also objects to this request
19 to the extent it seeks documents or information regarding conduct outside the applicable
20 statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly
21 burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses
22 in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.
23 Thomson SA further objects to this request to the extent it seeks the discovery of information
24 regarding the sale of CRTs or finished products containing CRTs outside of the United States
25 and unrelated to United States commerce on the grounds that it is overbroad, unduly
26 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
27 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
28

1 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
2 laws of any State.

3 **Request No. 43.**

4 Copies of all subpoenas or requests for production of Documents issued by any foreign
5 governmental or legislative investigative body referring or relating to CRTs during the Relevant
6 Period.

7 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
8 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
9 privileged or immune documents or information, including, without limitation, documents or
10 information subject to the attorney-client privilege, common-interest privilege, work-product
11 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
12 objects to this request to the extent it seeks documents or information the disclosure of which is
13 prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which
14 the documents or information are located, including, without limitation, the laws of France set
15 forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the
16 request contravenes applicable principles of public policy and international comity. Thomson SA
17 further objects to this request to the extent it seeks documents and information outside the scope
18 of discovery authorized by this Court's Orders. Thomson SA also objects to this request to the
19 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
20 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
21 oppressive, and seeks information that is neither relevant to any claims or defenses in this
22 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA
23 further objects to this request to the extent it seeks the discovery of information regarding the sale
24 of CRTs or finished products containing CRTs outside of the United States and unrelated to
25 United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and
26 not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond
27 the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the
28 United States, and beyond the jurisdiction or reach of the laws of any State.

1 **Request No. 44.**

2 All Documents relating to, prepared for, submitted to, or received by You as a result of
3 any investigation or research conducted either internally or by an outside entity with respect to
4 price fixing, anticompetitive information exchanges, price manipulation or manipulation of
5 production or capacity of CRTs.

6 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
7 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
8 privileged or immune documents or information, including, without limitation, documents or
9 information subject to the attorney-client privilege, common-interest privilege, work-product
10 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
11 objects to this request to the extent it seeks documents or information the disclosure of which is
12 prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which
13 the documents or information are located, including, without limitation, the laws of France set
14 forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the
15 request contravenes applicable principles of public policy and international comity. Thomson SA
16 further objects to this request to the extent it seeks documents and information outside the scope
17 of discovery authorized by this Court's Orders. Thomson SA also objects to this request to the
18 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
19 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
20 oppressive, and seeks information that is neither relevant to any claims or defenses in this
21 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA
22 further objects to this request to the extent it seeks the discovery of information regarding the sale
23 of CRTs or finished products containing CRTs outside of the United States and unrelated to
24 United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and
25 not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond
26 the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the
27 United States, and beyond the jurisdiction or reach of the laws of any State.

Request No. 45.

Documents sufficient to show the specifications (i.e., size, type, resolution, brightness, contrast ratio, viewing angle, and manufacturer) of each CRT purchased by each of the following entities during the Relevant Period:

- (a) You;
- (b) Thomson Consumer;
- (c) Technologies Displays;
- (d) Videocon Industries, Ltd.;
- (e) Any other Affiliated Entity of (a)-(d) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrase “sufficient to show the specifications” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA objects to this request because Plaintiffs’ use of the phrase “Affiliated Entities” attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents that are not in its possession, custody, or control, that are in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to

United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 46.

All Communications from the Relevant Period between You and any of the following entities relating to pricing, production levels, output, or line capacity for CRTs made, produced, or manufactured, in whole or in part, by any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product

1 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
2 objects to this request to the extent it seeks documents or information regarding conduct outside
3 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
4 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
5 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
6 admissible evidence. Thomson SA objects to this request because Plaintiffs' use of the phrase
7 "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce documents
8 that are not in its possession, custody, or control. Thomson SA also objects to this request to the
9 extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or
10 that are equally or more readily available to Plaintiffs from other Defendants, third parties, or
11 otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of
12 information regarding the sale of CRTs or finished products containing CRTs outside of the
13 United States and unrelated to United States commerce on the grounds that it is overbroad,
14 unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of
15 admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
16 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
17 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
18 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
19 jurisdiction(s) in which the information and/or documents are located, including, without
20 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
21 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
22 and seeks documents and information that are neither relevant to any claims or defenses in this
23 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without limiting each of these objections, Thomson SA will produce non-
25 privileged, responsive documents located in the course of a reasonable search to the extent such
26 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
27 documents are located, including, without limitation, the laws of France set forth in General
28 Objection No. 13.

Request No. 47.

Documents sufficient to show any of Your Employees during the Relevant Period who became or were at any other point of the Relevant Period employees of:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also objects to this request to the extent it would violate the legitimate privacy rights and expectations of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both current and former, or other individuals. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents that are not in its possession, custody, or control, that are in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs

outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, information and documents regarding employees involved with Thomson SA's non-CRT operations.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents regarding Thomson SA's employees involved with its former CRT business located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 48.

All documents from the Relevant Period which relate to or reflect the payment of the salary, retirement benefits, health insurance, medical bills, or any other monetary benefits by You to any Employee of any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks

1 privileged or immune documents or information, including, without limitation, documents or
2 information subject to the attorney-client privilege, common-interest privilege, work-product
3 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
4 objects to this request to the extent it would violate the legitimate privacy rights and expectations
5 of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both current and
6 former, or other individuals. Thomson SA also objects to this request to the extent it seeks
7 documents or information regarding conduct outside the applicable statute(s) of limitations
8 and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive,
9 and seeks information that is neither relevant to any claims or defenses in this litigation nor
10 reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further
11 objects to this request to the extent it calls for the creation of documents or data compilations that
12 do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to
13 this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an
14 obligation on Thomson SA to produce documents that are not in its possession, custody, or
15 control. Thomson SA also objects to this request to the extent it seeks information or documents
16 in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to
17 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
18 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
19 products containing CRTs outside of the United States and unrelated to United States commerce
20 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
21 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
22 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
23 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
24 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
25 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
26 located, including, without limitation, the laws of France set forth in General Objection No. 13.
27 Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad,
28 unduly burdensome, and oppressive, and seeks documents and information that are neither

relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, information and documents regarding employees involved with non-CRT operations.

Request No. 49.

All documents from the Relevant Period which relate to or reflect the payment of any business expenses of any of the following entities by You:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request on the grounds that it is vague and ambiguous, including, without limitation, as to the phrase “business expenses” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to this request because Plaintiffs’ use of the phrase “Affiliated Entities” attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third

parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, information and documents regarding Thomson SA's non-CRT operations.

Request No. 50.

All documents from the Relevant Period which relate to or reflect payment or authorization for payment of any travel expenses by You for any Employee of any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also

1 objects to this request to the extent it would violate the legitimate privacy rights and expectations
2 of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both current and
3 former, or other individuals. Thomson SA also objects to this request to the extent it seeks
4 documents or information regarding conduct outside the applicable statute(s) of limitations
5 and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive,
6 and seeks information that is neither relevant to any claims or defenses in this litigation nor
7 reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further
8 objects to this request to the extent it calls for the creation of documents or data compilations that
9 do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to
10 this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an
11 obligation on Thomson SA to produce documents that are not in its possession, custody, or
12 control. Thomson SA also objects to this request to the extent it seeks information or documents
13 in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to
14 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
15 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
16 products containing CRTs outside of the United States and unrelated to United States commerce
17 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
18 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
19 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
20 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
21 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
22 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
23 located, including, without limitation, the laws of France set forth in General Objection No. 13.
24 Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad,
25 unduly burdensome, and oppressive, and seeks documents and information that are neither
26 relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the
27 discovery of admissible evidence, including, without limitation, information and documents
28 regarding non-CRT operations.

Request No. 51.

All documents from the Relevant Period which relate to or reflect the transfer of money between You and any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) All other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-

1 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
 2 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
 3 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
 4 jurisdiction(s) in which the information and/or documents are located, including, without
 5 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
 6 objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and
 7 oppressive, and seeks documents and information that are neither relevant to any claims or
 8 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
 9 evidence, including, without limitation, information and documents regarding Thomson SA's
 10 non-CRT operations.

11 **Request No. 52.**

12 All documents from the Relevant Period which relate to or reflect the extension of credit
 13 between You and any of the following entities:

- 14 (a) Thomson Consumer;
- 15 (b) Technologies Displays;
- 16 (c) Videocon Industries, Ltd.;
- 17 (d) Any other Affiliated Entity of You or (a)-(c) above.

18 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 19 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 20 privileged or immune documents or information, including, without limitation, documents or
 21 information subject to the attorney-client privilege, common-interest privilege, work-product
 22 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
 23 objects to this request to the extent it seeks documents or information regarding conduct outside
 24 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
 25 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
 26 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
 27 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
 28 creation of documents or data compilations that do not exist or are not ordinarily kept in the

1 normal course of business. Thomson SA objects to this request because Plaintiffs' use of the
2 phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce
3 documents that are not in its possession, custody, or control. Thomson SA also objects to this
4 request to the extent it seeks information or documents in the possession, custody, or control of
5 Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third
6 parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the
7 discovery of information regarding the sale of CRTs or finished products containing CRTs
8 outside of the United States and unrelated to United States commerce on the grounds that it is
9 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
10 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
11 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
12 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
13 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
14 jurisdiction(s) in which the information and/or documents are located, including, without
15 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
16 objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and
17 oppressive, and seeks documents and information that are neither relevant to any claims or
18 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
19 evidence including, without limitation, information and documents regarding non-CRT
20 operations.

21 **Request No. 53.**

22 All budgets, draft budgets, financial forecasts, and business plans from the Relevant
23 Period provided to You by any of the following entities:

- 24 (a) Thomson Consumer;
25 (b) Technologies Displays;
26 (c) Videocon Industries, Ltd.;
27 (d) Any other Affiliated Entity of You or (a)-(c) above.
28

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects that this request is vague and ambiguous, including, without limitation, as to the terms “budgets,” “draft budgets,” “financial forecasts,” and “business plans” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or

defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, information and documents regarding non-CRT operations.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents regarding its former CRT business located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 54.

All documents reflecting or referring to any financial, economic, accounting, or production analyses that You conducted relating to any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this request to the extent it calls for the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce

documents that are not in its possession, custody, or control. Thomson SA also objects to this request to the extent it seeks information or documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, information and documents regarding non-CRT operations.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents regarding its former CRT business located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 55.

All documents reflecting or referring to any contract or agreement, either executed or proposed, between You and any of the following entities, including, but not limited to, shared services agreements, transition services agreements, agreements to provide information technology services, and agreements concerning the sale of any products:

- 1 (a) Thomson Consumer;
- 2 (b) Technologies Displays;
- 3 (c) Videocon Industries, Ltd.;
- 4 (d) Any other Affiliated Entity of You or (a)-(c) above.

5 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
6 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
7 privileged or immune documents or information, including, without limitation, documents or
8 information subject to the attorney-client privilege, common-interest privilege, work-product
9 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
10 objects to this request to the extent it seeks documents or information regarding conduct outside
11 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
12 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
13 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
14 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
15 creation of documents or data compilations that do not exist or are not ordinarily kept in the
16 normal course of business. Thomson SA objects to this request because Plaintiffs' use of the
17 phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce
18 documents that are not in its possession, custody, or control. Thomson SA also objects to this
19 request to the extent it seeks information or documents in the possession, custody, or control of
20 Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third
21 parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the
22 discovery of information regarding the sale of CRTs or finished products containing CRTs
23 outside of the United States and unrelated to United States commerce on the grounds that it is
24 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
25 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
26 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
27 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
28 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign

jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents regarding its former CRT business located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 56.

All Communications between You and any governmental agency or representative (of any locality, county, state, country, or continent) relating to any of the following entities:

- (a) Thomson Consumer;
- (b) Technologies Displays;
- (c) Videocon Industries, Ltd.;
- (d) Any other Affiliated Entity of You or (a)-(c) above.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request to the extent it seeks documents or information the disclosure of which is prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which the documents or information are located, including, without limitation, the laws of France set forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the request contravenes applicable principles of public policy and international comity. Thomson

1 SA further objects to this request to the extent it seeks documents and information outside the
2 scope of discovery authorized by the Court's Orders. Thomson SA objects to this request
3 because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on
4 Thomson SA to produce documents that are not in its possession, custody, or control. Thomson
5 SA also objects to this request to the extent it seeks documents or information regarding conduct
6 outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it
7 is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to
8 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
9 admissible evidence. Thomson SA further objects to this request to the extent it seeks the
10 discovery of information regarding the sale of CRTs or finished products containing CRTs
11 outside of the United States and unrelated to United States commerce on the grounds that it is
12 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
13 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
14 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
15 of the laws of any State.

16 Subject to and without limiting each of these objections, Thomson SA will produce non-
17 privileged, responsive documents regarding its former CRT business located in the course of a
18 reasonable search to the extent such production will not violate the laws of the foreign
19 jurisdiction(s) in which the information and/or documents are located, including, without
20 limitation, the laws of France set forth in General Objection No. 13.

21 **Request No. 57.**

22 Documents sufficient to show any instance in which You brought any legal action or
23 proceeding against any of the following entities:

- 24 (a) Thomson Consumer;
25 (b) Technologies Displays;
26 (c) Videocon Industries, Ltd.;
27 (d) Any other Affiliated Entity of You or (a)-(c) above.
28

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects to this request to the extent it seeks documents or information the disclosure of which is prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which the documents or information are located, including, without limitation, the laws of France set forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the request contravenes applicable principles of public policy and international comity. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA objects to this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce documents that are not in its possession, custody, or control. Thomson SA further objects to this request to the extent it seeks the discovery of information regarding the sale of CRTs or finished products containing CRTs outside of the United States and unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State.

Request No. 58.

Documents sufficient to show any instance in which any Affiliated Entity brought any legal action or proceeding against any of the following entities:

(a) You;

(b) Thomson Consumer;

1 (c) Technologies Displays;

2 (d) Videocon Industries, Ltd.;

3 (e) Any other Affiliated Entity of You or (a)-(c) above.

4 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
5 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
6 privileged or immune documents or information, including, without limitation, documents or
7 information subject to the attorney-client privilege, common-interest privilege, work-product
8 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
9 objects to this request to the extent it seeks documents or information the disclosure of which is
10 prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which
11 the documents or information are located, including, without limitation, the laws of France set
12 forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the
13 request contravenes applicable principles of public policy and international comity. Thomson SA
14 further objects to this request to the extent it seeks documents or information the disclosure of
15 which is prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in
16 which the documents or information are located, and on the grounds that the request contravenes
17 applicable principles of public policy and international comity. Thomson SA further objects to
18 this request to the extent it seeks documents and information outside the scope of discovery
19 authorized by the Court's Orders. Thomson SA objects to this request because Plaintiffs' use of
20 the phrase "Affiliated Entities" attempts to impose an obligation on Thomson SA to produce
21 documents that are not in its possession, custody, or control. Thomson SA also objects to this
22 request to the extent it seeks documents or information regarding conduct outside the applicable
23 statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly
24 burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses
25 in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.
26 Thomson SA further objects to this request to the extent it seeks the discovery of information
27 regarding the sale of CRTs or finished products containing CRTs outside of the United States and
28 unrelated to United States commerce on the grounds that it is overbroad, unduly burdensome,

1 irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Such
 2 sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust
 3 laws of the United States, and beyond the jurisdiction or reach of the laws of any State.

4 **Request No. 59.**

5 Documents sufficient to show any instance in which Thomson Consumer or Videocon
 6 Industries, Ltd. brought any legal action or proceeding against You or any Affiliated Entity.

7 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 8 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 9 privileged or immune documents or information, including, without limitation, documents or
 10 information subject to the attorney-client privilege, common-interest privilege, work-product
 11 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 12 objects to this request to the extent it seeks documents or information the disclosure of which is
 13 prohibited by law, regulation, court order, or other authority of the foreign jurisdiction in which
 14 the documents or information are located, including, without limitation, the laws of France set
 15 forth in General Objection No. 13. Thomson SA objects to this request on the grounds that the
 16 request contravenes applicable principles of public policy and international comity. Thomson SA
 17 further objects to this request to the extent it seeks documents and information outside the scope
 18 of discovery authorized by the Court's Orders. Thomson SA objects to this request because
 19 Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an obligation on Thomson
 20 SA to produce documents that are not in its possession, custody, or control. Thomson SA also
 21 objects to this request to the extent it seeks documents or information regarding conduct outside
 22 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
 23 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
 24 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
 25 admissible evidence. Thomson SA further objects to this request to the extent it seeks the
 26 discovery of information regarding the sale of CRTs or finished products containing CRTs
 27 outside of the United States and unrelated to United States commerce on the grounds that it is
 28 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery

1 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
 2 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
 3 of the laws of any State.

4 **Request No. 60.**

5 Documents sufficient to identify all legal proceedings, court filings, or filings with a
 6 governmental agency of any locality, county, state, country, or continent wherein any You,
 7 Thomson Consumer, Technologies Displays, Videocon Industries, Ltd., or any other Affiliated
 8 Entity claimed protection from antitrust liability pursuant to *Copperweld Corp. v. Independence*
 9 *Tube Corp.*, 467 U.S. 752 (1984), its progeny, or its state law counterparts.

10 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 11 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 12 privileged or immune documents or information, including, without limitation, documents or
 13 information subject to the attorney-client privilege, common-interest privilege, work-product
 14 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA objects to
 15 this request to the extent that disclosure to Plaintiffs of information and/or documents responsive
 16 to it would violate the laws of the foreign jurisdiction(s) in which the information and/or
 17 documents are located, including, without limitation, the laws of France set forth in General
 18 Objection No. 13. Thomson SA further objects to this request to the extent it seeks documents
 19 and information outside the scope of discovery authorized by the Court's Orders. Thomson SA
 20 also objects to this request to the extent it seeks documents or information regarding conduct
 21 outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it
 22 is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to
 23 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
 24 admissible evidence. Thomson SA further objects to this request to the extent it seeks the
 25 discovery of information regarding the sale of CRTs or finished products containing CRTs
 26 outside of the United States and unrelated to United States commerce on the grounds that it is
 27 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
 28 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-

1 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
2 of the laws of any State.

3 Subject to and without limiting each of these objections, Thomson SA will produce non-
4 privileged, responsive documents located in the course of a reasonable search to the extent such
5 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
6 documents are located, including, without limitation, the laws of France set forth in General
7 Objection No. 13.

8 **Request No. 61.**

9 Documents sufficient to show the source (whether a CRT Manufacturer or CRT Product
10 Manufacturer) of the CRTs each of the following entities purchased at any given time during the
11 Relevant Period, including, but not limited to, invoices, inventory data, and contracts for bulk
12 purchases of CRTs:

- 13 (a) Thomson Consumer;
- 14 (b) Technologies Displays;
- 15 (c) Videocon Industries, Ltd.;
- 16 (d) Any other Affiliated Entity of You or (a)-(c) above.

17 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
18 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
19 privileged or immune documents or information, including, without limitation, documents or
20 information subject to the attorney-client privilege, common-interest privilege, work-product
21 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
22 objects that the phrase “show the source” is vague and ambiguous in the context of this request.
23 Thomson SA also objects to this request to the extent it seeks documents or information
24 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
25 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
26 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
27 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
28 calls for the creation of documents or data compilations that do not exist or are not ordinarily

1 kept in the normal course of business. Thomson SA also objects to this request to the extent it
 2 seeks information or documents that are not in its possession, custody, or control, that are in the
 3 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
 4 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
 5 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
 6 products containing CRTs outside of the United States and unrelated to United States commerce
 7 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
 8 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
 9 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
 10 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
 11 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
 12 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
 13 located, including, without limitation, the laws of France set forth in General Objection No. 13.
 14 Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad,
 15 unduly burdensome, and oppressive, and seeks documents and information that are neither
 16 relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the
 17 discovery of admissible evidence.

18 Subject to and without limiting each of these objections, Thomson SA will produce non-
 19 privileged, responsive documents located in the course of a reasonable search to the extent such
 20 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 21 documents are located, including, without limitation, the laws of France set forth in General
 22 Objection No. 13.

23 **Request No. 62.**

24 Documents sufficient to describe Your policies or practices with respect to the retention
 25 or destruction of Documents during the period March 1, 1995 through the present, and, if such
 26 policy or practice has been different with respect to any category of Documents or over different
 27 times, Documents sufficient to identify each such category or time period and to describe Your
 28 retention policy or practice with respect to each such category or time period.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects that the phrase “policies or practices” is vague and ambiguous in the context of this
7 request. Thomson SA also objects to this request to the extent it seeks documents or information
8 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
9 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
10 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
11 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
12 calls for the creation of documents or data compilations that do not exist or are not ordinarily
13 kept in the normal course of business. Thomson SA also objects to this request to the extent it
14 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
15 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
16 Thomson SA further objects to this request to the extent it seeks the discovery of information
17 regarding the sale of CRTs or finished products containing CRTs outside of the United States
18 and unrelated to United States commerce on the grounds that it is overbroad, unduly
19 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
20 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
21 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
22 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
23 of information and/or documents responsive to it would violate the laws of the foreign
24 jurisdiction(s) in which the information and/or documents are located, including, without
25 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
26 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
27 and seeks documents and information that are neither relevant to any claims or defenses in this
28 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without limiting each of these objections, Thomson SA will produce non-
 2 privileged, responsive documents located in the course of a reasonable search to the extent such
 3 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 4 documents are located, including, without limitation, the laws of France set forth in General
 5 Objection No. 13.

6 **Request No. 63.**

7 Documents sufficient to show the manner in which You have maintained records relating
 8 to CRTs during the period March 1, 1995 through the present, including Documents sufficient to
 9 describe all electronic data processing systems, programs and outputs used to record, store,
 10 compute, analyze or retrieve electronically stored information relating to Your pricing,
 11 production, distribution, marketing or sale of CRTs in the United States.

12 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 13 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 14 privileged or immune documents or information, including, without limitation, documents or
 15 information subject to the attorney-client privilege, common-interest privilege, work-product
 16 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 17 objects that the phrases “electronic data processing systems” and “programs and outputs” are
 18 vague and ambiguous in the context of this request. Thomson SA also objects to this request to
 19 the extent it seeks documents or information regarding conduct outside the applicable statute(s)
 20 of limitations and/or continuing to present on the grounds that it is overbroad, unduly
 21 burdensome, oppressive, and seeks information that is neither relevant to any claims or defenses
 22 in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.
 23 Thomson SA further objects to this request to the extent it calls for the creation of documents or
 24 data compilations that do not exist or are not ordinarily kept in the normal course of business.
 25 Thomson SA also objects to this request to the extent it seeks information or documents in the
 26 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
 27 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
 28 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished

1 products containing CRTs outside of the United States and unrelated to United States commerce
 2 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
 3 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
 4 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
 5 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
 6 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
 7 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
 8 located, including, without limitation, the laws of France set forth in General Objection No. 13.
 9 Finally, Thomson SA objects to this request on the grounds that it is compound, overbroad,
 10 unduly burdensome, and oppressive, and seeks documents and information that are neither
 11 relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the
 12 discovery of admissible evidence.

13 Subject to and without limiting each of these objections, Thomson SA will produce non-
 14 privileged, responsive documents located in the course of a reasonable search to the extent such
 15 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 16 documents are located, including, without limitation, the laws of France set forth in General
 17 Objection No. 13.

18 **Request No. 64.**

19 All Documents related to Your rental, lease, purchase, maintenance, or ownership of
 20 offices or manufacturing facilities in the United States during the Relevant Period that were
 21 related to the manufacture or sale of CRTs or CRT Products.

22 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 23 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 24 privileged or immune documents or information, including, without limitation, documents or
 25 information subject to the attorney-client privilege, common-interest privilege, work-product
 26 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
 27 objects to this request on the grounds that it is vague and ambiguous. Thomson SA also objects
 28 to this request to the extent it seeks documents or information regarding conduct outside the

1 applicable statute(s) of limitations and/or continuing to present on the grounds that it is
2 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
3 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
4 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
5 creation of documents or data compilations that do not exist or are not ordinarily kept in the
6 normal course of business. Thomson SA also objects to this request to the extent it seeks
7 information or documents that are not in its possession, custody, or control, that are in the
8 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
9 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
10 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
11 products containing CRTs outside of the United States and unrelated to United States commerce
12 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
13 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
14 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
15 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
16 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
17 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
18 located, including, without limitation, the laws of France set forth in General Objection No. 13.
19 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
20 burdensome, and oppressive, and seeks documents and information that are neither relevant to
21 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
22 admissible evidence.

23 **Request No. 65.**

24 Documents sufficient to show which Employees or members of Your Board of Directors
25 simultaneously served as a director and/or officer of any company related to the manufacture or
26 sale of CRTs that was incorporated in the United States during the Relevant Period.

27 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
28 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks

1 privileged or immune documents or information, including, without limitation, documents or
2 information subject to the attorney-client privilege, common-interest privilege, work-product
3 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
4 objects to this request on the grounds that it is vague and ambiguous. Thomson SA also objects
5 to this request to the extent it seeks documents or information regarding conduct outside the
6 applicable statute(s) of limitations and/or continuing to present on the grounds that it is
7 overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to any
8 claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
9 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
10 creation of documents or data compilations that do not exist or are not ordinarily kept in the
11 normal course of business. Thomson SA also objects to this request to the extent it seeks
12 information or documents that are not in its possession, custody, or control, that are in the
13 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
14 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
15 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
16 products containing CRTs outside of the United States and unrelated to United States commerce
17 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
18 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
19 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
20 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
21 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
22 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
23 located, including, without limitation, the laws of France set forth in General Objection No. 13.
24 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
25 burdensome, and oppressive, and seeks documents and information that are neither relevant to
26 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
27 admissible evidence.

1 Subject to and without limiting each of these objections, Thomson SA will produce non-
2 privileged, responsive documents located in the course of a reasonable search to the extent such
3 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
4 documents are located, including, without limitation, the laws of France set forth in General
5 Objection No. 13.

6 **Request No. 66.**

7 Documents sufficient to show all Your Employees related to the manufacture or sale of
8 CRTs based in the United States during the Relevant Period. For each relevant employee,
9 provide:

- 10 (a) The dates of hiring and termination;
11 (b) Title(s) held;
12 (c) Location(s) of employment.

13 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
14 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
15 privileged or immune documents or information, including, without limitation, documents or
16 information subject to the attorney-client privilege, common-interest privilege, work-product
17 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
18 objects to this request on the grounds that the phrase “based in the United States” is vague and
19 ambiguous. Thomson SA also objects to this request to the extent it seeks documents or
20 information regarding conduct outside the applicable statute(s) of limitations on the grounds that
21 it is overbroad, unduly burdensome, oppressive, and seeks information that is neither relevant to
22 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
23 admissible evidence. Thomson SA further objects to this request to the extent it calls for the
24 creation of documents or data compilations that do not exist or are not ordinarily kept in the
25 normal course of business. Thomson SA also objects to this request to the extent it seeks
26 information or documents that are not in its possession, custody, or control, that are in the
27 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
28 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this

1 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
2 products containing CRTs outside of the United States and unrelated to United States commerce
3 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
4 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
5 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
6 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
7 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
8 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
9 located, including, without limitation, the laws of France set forth in General Objection No. 13.
10 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly
11 burdensome, and oppressive, and seeks documents and information that are neither relevant to
12 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Subject to and without limiting each of these objections, Thomson SA will produce non-
15 privileged, responsive documents regarding employees who were responsible for pricing and/or
16 selling CRTs in the United States during the Relevant Period located in the course of a
17 reasonable search to the extent such production will not violate the laws of the foreign
18 jurisdiction(s) in which the information and/or documents are located, including, without
19 limitation, the laws of France set forth in General Objection No. 13.

1
2 Dated: May 14, 2014

/s/ Kathy L. Osborn

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

No. 07-cv-5944-SC

MDL No. 1917

This Document Relates to:

CERTIFICATE OF SERVICE

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
 et al.*, No. 13-cv-1173;

*Electrograph Systems, Inc., et al. v. Technicolor
 SA, et al.*, No. 13-cv-05724;

Siegel v. Technicolor SA, et al., No. 13-cv-
 05261;

*Best Buy Co., Inc., et al. v. Technicolor SA, et
 al.*, No. 13-cv-05264;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;
Interbond Corporation of America v. Technicolor SA, et al., No. 13-cv-05727;
Office Depot, Inc. v. Technicolor SA, et al., No. 13-cv-05726;
Costco Wholesale Corporation v. Technicolor SA, et al., No. 13-cv-05723;
P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al., No. 13-cv-05725;
Schultze Agency Services, LLC v. Technicolor SA, et al., No. 13-cv-05668;
Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, et al., No. 13-cv-05262;
Tech Data Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-00157.

I HEREBY CERTIFY that a true and correct copy of Thomson SA's Responses to Direct Action Plaintiffs' First Set of Requests for Production of Documents was served by email to each of the following addressees listed below.

Dated: May 14, 2014

By: /s/ Kathy L. Osborn

Kathy L. Osborn

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